

## WHISTLE BLOWING POLICY

### Definition:

“Appointed Persons”	:	Audit Committee Chairman and Senior Independent Director
“Associated Third Party”	:	Any individual or organisation that an associate may come into contact during the course of his/her engagement with the Group, which may include but not limited to suppliers, contractors, agents, consultants, outsourced personnel, distributors, advisers, government and public bodies including their advisors, representatives and officials
“Board”	:	The Board of Directors of the Company
“Company” or “SAG”	:	Sinaran Advance Group Berhad
“Director”	:	A director of the Company
“Employees”	:	The employees, Board, engineer, senior managers, managers, site supervisor and all individual working at all levels and grades
“Group”	:	The Company and its subsidiaries from time to time
“Whistle Blower”	:	Any Employees and Associated Third Party of the Group who makes a disclosure in good faith of improper conduct or alleged wrongdoings occurring in the Group
“Whistle Blowing”	:	The disclosure in good faith by the Employees and Associated Third Parties of the Group, to the management or directors, of actual, suspected or anticipated mismanagement, corruption, illegality, or some other wrongdoings within the Group

### 1. OVERVIEW

This Whistle Blowing Policy shall apply to all individual working for SAG and the Group at all levels and grades which include Employees and the Associated Third Parties.

The Group encourages all Employees and Associated Third Party to raise genuine concerns about possible improprieties in matters of financial reporting, compliance, malpractices and unethical business conduct within the Group at the earliest opportunity and in an appropriate way.

This Policy aims to:

- (a) Support the Company’s values;
- (b) Ensure employees of the Group can raise concerns without fear of reprisals and safeguard such persons’ confidentiality;
- (c) Protect a whistle-blower from reprisal in consequence of making a disclosure; and
- (d) Provide a transparent and confidential process for dealing with concerns.

**SINARAN ADVANCE GROUP BERHAD**  
**[REGISTRATION NO. 202001007513 (1363833-T)]**  
**WHISTLE BLOWING POLICY**

This Policy not only covers possible improprieties in matters of financial reporting, but also:

- Fraud;
- Corruption, bribery or blackmail;
- Criminal offences;
- Failure to comply with a legal or regulatory obligation;
- Miscarriage of justice;
- Endangerment of an individual's health and safety; and
- Concealment of any, or a combination, of the above.

## **2. SCOPE OF MATTERS**

The scope of matters covered by this Policy not only relates to concerns and complaints regarding financial matters but also the following (not exhaustive):

- (a) Financial malpractice, impropriety or fraud;
- (b) corruption, bribery or blackmail;
- (c) failure to comply with laws or regulations or group/company policies and procedures;
- (d) criminal offences and miscarriage of justice;
- (e) endangerment of an individual's health and safety;
- (f) falsification or destruction of business or financial records, or misrepresentation or suppression of financial information; or
- (g) concealment of any, or a combination, of the above.

This Policy does not apply to grievances concerning employee's terms of employment or other aspects of concerns or complaints within the scope of the Staff Policy.

## **3. PRINCIPLES**

The principles underpinning this Policy are as follows:

- (a) All concerns raised will be treated fairly and properly.
- (b) The Group will not tolerate harassment or victimisation of anyone raising a genuine concern.
- (c) The Group will ensure no Whistle Blower will be at risk of suffering some form of reprisal as a result of raising a concern even if he is mistaken. The Group, however, does not extend this assurance to someone who maliciously raises a matter he knows is untrue or is acting for personal gain.
- (d) The submission of a false or frivolous report may have consequences for Whistle Blower and he may be liable for damages towards anyone who suffered from such false report.

## **4. POLICIES AND PROCEDURES**

4.1 If any individual believes reasonably and in good faith that suspected incident of improper conduct or malpractice exists within the Group, the individual should report this immediately to the Appointed Persons in writing, by hand, email or post, providing as much detail as possible and specifying:

- (a) the Whistle Blower's full name and contact details;
- (b) the background, date and history of the concerns;
- (c) the reasons for the concerns;
- (d) details of witnesses and all factual corroborating evidence as is available;
- (e) whether the Whistle Blower has any personal interest in the matter;
- (f) whether action has already been taken by anyone.

The Group shall not accept any anonymous disclosure.

**SINARAN ADVANCE GROUP BERHAD**  
**[REGISTRATION NO. 202001007513 (1363833-T)]**  
**WHISTLE BLOWING POLICY**

4.2 Whistle Blower raises a concern in writing by filing in email or mail "Confidential" to the Appointed Persons to one of the following manner:-

(a) By hand or post

**Audit Committee**

Registered Office in Malaysia

Sinaran Advance Group Berhad

c/o Securities Services (Holdings) Sdn. Bhd.

Level 7, Menara Milenium, Jalan Damanlela, Pusat Bandar Damansara, Damansara Heights, 50490 Kuala Lumpur, Wilayah Persekutuan Kuala Lumpur, Malaysia

Telephone Number: +603 2084 9000

4.3 The Appointed Persons who receive the complaint shall maintain all complaints received, tracking their receipt, investigation and resolution. Each report shall be screened to assess its reliability and whether there is sufficient information to warrant an investigation.

4.4 The Whistle Blower would be reminded not to contact the subject of the disclosure and to discuss the matter with anyone unless directed by the Audit Committee.

4.5 The Appointed Persons may decide not to investigate a complaint if in his opinion the complaint:

(a) is trivial; or

(b) is frivolous or vexatious; or

(c) if the Whistle Blower has had knowledge for more than 12 months of the disclosed matter and failed to give a satisfactory explanation for the delay in making the disclosure.

If the matter is determined not to be within the scope of this Policy, such matter will be transferred to the Head of Human Resources for appropriate procedures and actions to be taken.

4.6 The investigation shall be focused on the following:-

(a) Collation of relevant information pertaining to the allegation;

(b) Conduct relevant interviews, if required;

(c) Review of the information collected;

(d) Maintenance of fair treatment to the Whistle Blower and the subject of the complaint;

(e) Protection of the identity of the Whistle Blower; and

(f) Recommendation of the findings.

4.7 Each case is treated with the strictest confidence and it is expected that the relevant investigations and findings shall be finalised within a period of 60 days from the receipt of the disclosure by the Whistle Blower. However, for complicated matters, a longer time period may be required with the consent of the Audit Committee.

4.8 The Whistle Blower shall be informed on the outcome of the investigation.

4.9 All investigations shall be tabled to the Audit Committee of the Board that has the authority to ensure effective implementation of this Policy. The Audit Committee shall update the Board of Directors on reports that require their attention and approval.

4.10 The Head of Human Resources shall maintain all relevant documents as confidential and stored the documents securely for at least seven years.

**SINARAN ADVANCE GROUP BERHAD**  
**[REGISTRATION NO. 202001007513 (1363833-T)]**  
**WHISTLE BLOWING POLICY**

- 4.11 The identities of the employees will not be disclosed without prior consent. In the event where concerns cannot be resolved without revealing the identity of the employee who raised the concern (i.e. if the evidence is required in court), a dialogue will be carried out with the employee concerned as to whether and how the matter can progress further.
- 4.12 If the Whistle Blower has, or is found to have:
- (a) committed a wrongdoing;
  - (b) taken serious risks which would likely cause a wrongdoing to be committed;
  - (c) made a disclosure not in accordance with the requirements of this Policy (for instance, dishonest, mischievous or malicious complaints); or
  - (d) participated or assisted in any process pursuant to this Policy otherwise than in good faith, the corrective actions to be taken against the Whistle Blower will be determined by the Chief Executive Officer or, if so delegated by the Chief Executive Officer, Head of Human Resources, which may include, disciplinary measures, formal warning or reprimand, demotion, suspension or termination of employment or services or monetary or other forms of punishment.
- 4.13 The identity and personal information of the Whistle Blower will be protected and kept confidential, unless the Whistle Blower agrees otherwise or unless otherwise required by law. The Whistle Blower will be protected from reprisal, including any form of harassment and victimisation, as a consequence of his disclosure. If a Whistle Blower reasonably believes that he is being subjected to reprisal, including harassment and victimisation, as a consequence of whistle-blowing, he may consult or report to the Appointed Persons.

**5. REVIEW OF THIS POLICY**

This Policy shall be reviewed by the Board annually to ensure they remain consistent with the Board's objectives and responsibilities, and relevant laws, regulations, guidelines and standards of corporate governance.

*The Policy was reviewed and approved by the Board of Directors on 21 May 2021.*